

Dockets Management Branch  
Food and Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

8597 '00 DEC -4 10:48

**RE: Docket No. 99F-2673**

November 26, 2000

Dear FDA:

We strongly object to your approval of irradiation on alfalfa and other sprouting seeds for the control of microbial pathogens. Although there have been a few cases of sprout contamination by E. coli 0157H7, we feel that the E. coli problem should be solved on the farm where it originates, not by subjecting numerous off-farm foods that have been contaminated by farm manure and farm water run-off, to ionizing radiation. The problem (including contamination of well water) needs to be corrected at its farm source.

Consumers United for Food Safety (CUFFS) has followed the food irradiation issue since 1982 and has questioned the deficient, flawed and contradictory studies used to justify the approval of irradiation for numerous foods. Public Citizen has written a referenced criticism of the FDA's handling of food irradiation petitions ( A Broken Record, October 2000, available at [www.citizen.org/cmep](http://www.citizen.org/cmep) ). We concur with their summary that the proper and necessary toxicological studies have not yet been done to guarantee the safety of the mass consumption of irradiated foods. We also feel that the present FDA is losing its credibility and has become "politicized" by Congressional budget riders.

In the FDA approval of irradiation for sprouting seeds, no toxicity studies were done on the sprouts from irradiated seeds. Moreover, we think it is scandalous not to label sprouts from irradiated seeds. We urge you to reevaluate your approval and most certainly to correct the lack of consumer labeling.

Sincerely,



Connie Wheeler, Managing Director  
Consumers United for Food Safety  
P.O. Box 22928  
Seattle, WA 98122  
425-747-2659

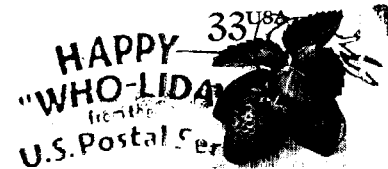
99F-2673

C/D



P.O. Box 22928 Seattle, WA 98122

HFU  
305



Dockets Management Branch  
RE: Docket No. 99F-2673  
Food and Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852